

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

NEORA, LLC, SIGNUM BIOSCIENCES,
SIGNUM NUTRALOGIX, and
JEFFREY OLSON,

Defendants.

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Civil Action No. 3:20-cv-01979-M

**RESPONSE OF DEFENDANTS IN OPPOSITION TO
THE FEDERAL TRADE COMMISSION’S MOTION FOR SUMMARY JUDGMENT**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure and Local Rule 56.4, Defendants Neora, LLC and Jeffrey Olson (“Defendants”) file this Response in Opposition to the Federal Trade Commission’s Motion for Summary Judgment.

The matters required by Local Rule 56.4(a) will be set forth in the Sealed Brief in Support of Response of Defendants in Opposition to the Federal Trade Commission’s Motion for Summary Judgment, filed concurrently with this Response.

WHEREFORE, Defendants respectfully request that the Court deny the Federal Trade Commission’s Motion for Summary Judgment (Dkt. 143) and grant Defendants such other and further relief at law or in equity to which Defendants may show themselves justly entitled.

Date: August 12, 2022

Respectfully submitted,

/s/ Craig B. Florence

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**COUNSEL FOR DEFENDANTS
NEORA, LLC and JEFFREY OLSON**

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that a true and correct copy of the above and foregoing document has been served on August 12, 2022 on all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system.

/s/ Craig B. Florence

Craig B. Florence